

# Robinson+Cole

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April 19, 2024

**VIA ECF**

Hon. Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: **Doe v. First Unum Life Insurance Company**  
**23-cv-6985-DLC**  
**Joint Motion to Adjourn Initial Pretrial Conference**

Dear Judge Cote:

This firm represents defendant, First Unum Life Insurance Company ("First Unum"). I write on behalf of both parties to request an adjournment of the Initial Pretrial Conference scheduled for April 24, 2024.

There are two reasons for the adjournment. First, I will be out of town on April 24, 2024. Second, the parties have completed discovery in this action (pursuant to a schedule fixed by Judge Crotty on December 19, 2023 (Doc. 17) and have scheduled a private mediation for May 16, 2024. The parties believe that fixing a schedule for next steps in the litigation would be more productive after the mediation.

As noted above, counsel for Plaintiff joins in this motion. Counsel for both parties are available on the following Fridays: May 31, June 7 and June 21, at any time that is convenient for the Court.

Respectfully,

/s/ Patrick W. Begos

cc: All Counsel of Record (*via ECF*)

*The conference is adjourned to  
June 21 at 2:00 p.m.*  
*Denise Cote  
4/19/24*